

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-G and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara R. Binis  
Barbara R. Binis  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsmith.com

/s/ Erik W. Legg  
Erik W. Legg  
FARRELL WHITE & LEGG  
P. O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
EWL@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ Laura J. Baughman  
Laura J. Baughman  
BARON & BUDD  
Suite 1100  
3102 Oak Lawn Avenue  
Dallas, TX 75219-4281  
214.521.3605 (phone)  
214.520.1181 (fax)  
lbaughman@baronbudd.com  
*Attorney for Plaintiffs on Exhibit A*

/s/ Koren Leslie Cohen  
Koren Leslie Cohen  
DOUGLAS & LONDON  
6th Floor  
59 Maiden Lane  
New York, NY 10038  
212.566.7500 (phone)  
212.566.7501 (fax)  
kcohen@douglasandlondon.com  
*Attorney for Plaintiffs on Exhibit B*

/s/ Tonya L. Melnichenko  
Tonya L. Melnichenko  
FRANKLIN D. AZAR & ASSOCIATES  
14426 East Evans Avenue  
Aurora, CO 80014  
303.757.3300 (phone)  
303.759.5203 (fax)  
alexanderb@fdazar.com  
*Attorney for Plaintiffs on Exhibit C*

/s/ Howard L. Nations  
Howard L. Nations  
THE NATIONS LAW FIRM  
Suite 208  
3131 Briarpark Drive  
Houston, TX 77042-3795  
713.807.8400 (phone)  
713.807.8423 (fax)  
charles@howardnations.com  
*Attorney for Plaintiffs on Exhibit D*

/s/ Derek H. Potts  
Derek H. Potts  
THE POTTS LAW FIRM  
Suite 350  
100 Waugh Drive  
Houston, TX 77007  
713.963.8881 (phone)  
713.583.5388 (fax)  
Email: dpotts@potts-law.com  
*Attorney for Plaintiffs on Exhibit E*

/s/ Leslie C. MacLean  
Leslie C. MacLean  
WATERS & KRAUS  
3219 McKinney Avenue  
Dallas, TX 75204  
214.357.6244 (phone)  
214.357.7252 (fax)  
lmaclean@waterskraus.com  
*Attorney for Plaintiffs on Exhibit F*

/s/ Sejal K. Brahmbhatt  
Sejal K. Brahmbhatt  
WILLIAMS KHERKHER HART  
BOUNDAS  
Suite 600  
8441 Gulf Freeway  
Houston, TX 77017  
713.230.2227 (phone)  
713.643.6226 (fax)  
sbrahmbhatt@williamskherkher.com  
*Attorney for Plaintiffs on Exhibit G*

Dated: May 23, 2016

**EXHIBIT A – BARON & BUDD, P.C.**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:15-CV-02259	Suzanne Wilson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT B – DOUGLAS & LONDON, P.C.**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-22422	Antoinette Prussen v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT C – FRANKLIN D. AZAR & ASSOCIATES, P.C.**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-04494	Jill Ann Hine, Charles Hine v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT D – THE NATIONS LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-01016	Cathy Louise Hartley, Dan Hartley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT E – THE POTTS LAW FIRM**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-33827	Sheila Korup, Marvel Korup v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**EXHIBIT F – WATERS & KRAUS**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-18113	Holly S. Groeschel, David Groeschel v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-08500	Toni Rudolf, John Rudolf v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.



**EXHIBIT G – WILLIAMS KHERKHER HART BOUNDAS, LLP**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-CV-14996	Dorothy Presley, Luther Presley v. Ethicon, Inc., American Medical Systems, Inc., Johnson & Johnson
2:13-CV-20713	Rosita Meyer, Daniel Meyer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-10706	Kathy Esparza v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-10897	Donna Marie Kesler, Robert Kesler v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-11829	Linda M. White v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis